



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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October 16, 2007

Ref: 8EPR-N

Rhonda O'Byrne
District Ranger
Northern Hills Ranger District
2014 North Main Street
Spearfish, SD 57783

RE: Citadel Project Area, Final Environmental
Impact Statement
CEQ# 20070382

Dear Ms. O'Byrne:

The Environmental Protection Agency (EPA) Region 8 Office has reviewed the Final Environmental Impact Statement (FEIS) for the Citadel Project Area on the Black Hills National Forest. The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action.

The proposed activities include vegetative and fuels treatments on a total of 13,035 acres of National Forest System land in the project area. Within the project area, this includes commercial treatment on 10,541 acres, non-commercial treatment on 12,928 acres and prescribed fire on 8,952 acres. The project also includes construction of 18 miles of new roads, reconstruction of 35 miles of existing roads necessary to access timber stands, and closure of 31 miles of unclassified (non-NFS) roads. The key issues identified as the focus for the project are fire hazard in the wildland urban interface (WUI), mountain pine beetle infestation, wildlife habitat and volume of commercial timber produced.

EPA finds the FEIS responsive to most of our comments, which focused on impacts to water quality, aquatic resources and wildlife habitat from new road construction. While acknowledging that information has been added to the FEIS in response to our comments, EPA is still concerned that the transportation system is being expanded when currently the existing

system and non-system roads are damaging water, soil and habitat resources. The FEIS states that construction of all of the proposed roads is necessary for gaining access to the fire hazard areas both within and outside of the WUI. Considering the high road density within the BHNF, EPA would like to have seen more of an effort to minimize new road construction in meeting the project purpose of reducing fire hazard.

EPA appreciates the inclusion of additional information on potential methods of road closure, and the discussion of the site-specific approach that will be undertaken to maximize effectiveness. The Aquatic Resources information in the FEIS is also clearer with respect to impacts to wetlands and requirements specified in the timber sale contracts.

Thank you for the opportunity to review and comment on the FEIS. If you have any questions, please contact Jody Ostendorf of my staff at 303 312-7814, or me at 303 312-6004.

Sincerely,

OSB DBA for

Larry Svoboda
Director, NEPA Program
Ecosystems Protection and Remediation

